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October 22, 2019

File No. 6234.13561

**VIA E-MAIL**

Attorney General Wayne Stenehjem  
Office of the Attorney General  
Consumer Protection & Antitrust  
1050 E Interstate Avenue, Suite 200  
Bismarck, ND 58503-5574  
E-Mail: ndag@nd.gov

Re: Notice of Data Security Incident

Dear Attorney General Stenehjem:

I represent Kalispell Regional Healthcare ("KRH"), located in Kalispell, Montana with respect to a data security incident that may have involved personal information for 258 North Dakota residents. KRH notified the affected individuals pursuant to 42 CFR § 164.404 *et seq.* The reason I am writing now is to notify you of the incident pursuant to N.D. Cent. Code §§ 51-30-01 *et seq.*

KRH recently detected a possible data security incident involving a number of employee email accounts. Upon detecting a possible incident, it immediately secured the accounts, notified law enforcement, and launched an investigation. KRH's investigation included retaining a digital forensics firm to determine what happened and whether the incident involved unauthorized access to any personal information. The investigation determined that information may have been accessed without authorization as early as May 24, 2019. On August 28, 2019, the digital forensics firm confirmed that personal information for North Dakota residents may have been involved in the incident. KRH then worked to gather address information for all affected individuals. On October 22, 2019, KRH notified all affected residents via first-class mail and offered them 12 months of fraud consultation and identity restoration services. In addition, depending on the type of information involved, KRH offered many residents credit and identity monitoring services. KRH has reviewed its security measures in an effort to prevent a similar incident from occurring.

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Please contact me should you have any questions.

Sincerely,

*/s/ Simone McCormick*

Simone McCormick of  
LEWIS BRISBOIS BISGAARD & SMITH LLP

DEA  
Enclosure: Sample Consumer Notification Letter



<<Date>> (Format: Month Day, Year)

<<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<Zip>>

Subject: Notice of Data Security Event

Dear <<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>,

Despite being named in the top quartile for data security readiness by a third party firm, Kalispell Regional Healthcare (KRH) was recently the victim of a highly sophisticated attack on our information technology systems. This data security event may have involved your personal information. Safeguarding our patients and their personal information is a top priority, and we want you to be aware of what happened and how we have addressed it. Most importantly, we want to protect you as best we can by offering you twelve (12) months of identity and credit monitoring services at no charge.

**What happened?** This summer we discovered that several employees were victims of a well-designed email that led them to unknowingly provide their KRH login credentials to malicious criminals. We immediately disabled their accounts, notified federal law enforcement, and launched an investigation, which was performed by a nationally-recognized digital forensics firm, to determine whether any personal information was affected. On August 28, 2019, we learned that some patients' personal information may have been accessed without authorization. A deeper investigation determined that your personal information may have been accessed as early as May 24, 2019.

**What information was involved?** Different information may have been involved for each person. The information may have involved your name, Social Security number, address, medical record number, date of birth, telephone number, email address, medical history and treatment information, date of service, treating/referring physician, medical bill account number and/or health insurance information.

**What are we doing?** Although there is no indication that the information was misused, we are offering you 12 months of credit and identity monitoring services at no charge as an extra precaution. In addition, we have taken further steps to revise procedures that will minimize the risk of a similar event from happening again.

**What you can do:** We encourage you to take the steps recommended on the following page to further protect your personal information. You can also enroll in the complimentary identity monitoring services that we are offering for 12 months. The services include credit monitoring, identity monitoring, fraud consultation, and identity theft restoration. To enroll in the services online, please visit [krollbreach.idMonitoringService.com](http://krollbreach.idMonitoringService.com) and use the following membership number: <<Member ID>>. To receive credit monitoring services, you must be over the age of 18, have established credit in the United States, have a Social Security number in your name, and have a U.S. residential address associated with your credit file. The deadline to enroll in these services is January 31, 2020.

**For More Information:** If you have questions or need assistance, please call our designated help line at 1-877-514-0850, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time. Please have your membership number ready.

We are committed to protecting the privacy of our patients and have taken steps to prevent similar events from occurring in the future. In addition, we will work with the authorities to hold the perpetrators accountable for this attack against your privacy.

Our relationship with our patients is our most valued asset. I want to personally express my deepest regret for any inconvenience that these criminal actions may cause you and your family.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Lambrecht". The signature is fluid and cursive, with a prominent initial "C" and a long, sweeping tail.

Craig Lambrecht, MD  
President & CEO  
Kalispell Regional Healthcare

## STEPS YOU CAN TAKE TO FURTHER PROTECT YOUR INFORMATION

**Review Your Account Statements and Notify Law Enforcement of Suspicious Activity:** As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

**Copy of Credit Report:** You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print this form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>. You also can contact one of the following three national credit reporting agencies:

<b>TransUnion</b>	<b>Experian</b>	<b>Equifax</b>	<b>Free Annual Report</b>
P.O. Box 1000	P.O. Box 9532	P.O. Box 105851	P.O. Box 105281
Chester, PA 19016	Allen, TX 75013	Atlanta, GA 30348	Atlanta, GA 30348
1-877-322-8228	1-888-397-3742	1-800-525-6285	1-877-322-8228
<a href="http://www.transunion.com">www.transunion.com</a>	<a href="http://www.experian.com">www.experian.com</a>	<a href="http://www.equifax.com">www.equifax.com</a>	<a href="http://annualcreditreport.com">annualcreditreport.com</a>

**Fraud Alert:** You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

**Security Freeze:** You have the right to put a security freeze on your credit file. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. There should be no charge to place a security freeze on your credit file. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

**Additional Free Resources:** You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state. Residents of Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

<b>Federal Trade Commission</b>	<b>Maryland Attorney General</b>	<b>North Carolina Attorney General</b>	<b>Rhode Island Attorney General</b>
600 Pennsylvania Ave, NW	200 St. Paul Place	9001 Mail Service Center	150 South Main Street
Washington, DC 20580	Baltimore, MD 21202	Raleigh, NC 27699	Providence, RI 02903
<a href="http://consumer.ftc.gov">consumer.ftc.gov</a> , and	<a href="http://oag.state.md.us">oag.state.md.us</a>	<a href="http://ncdoj.gov">ncdoj.gov</a>	<a href="http://www.riag.ri.gov">http://www.riag.ri.gov</a>
<a href="http://www.ftc.gov/idtheft">www.ftc.gov/idtheft</a>	1-888-743-0023	1-877-566-7226	401-274-4400
1-877-438-4338			

You also have certain rights under the Fair Credit Reporting Act (FCRA), including the right to know what is in your file, to dispute incomplete or inaccurate information, and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, and your rights pursuant to the FCRA, please visit [http://files.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf).